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**Hearing Date and Time: June 21, 2011  
at 10:00 a.m.**

*Attorneys for Unifrax I LLC f/k/a Unifrax Corporation*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

.....X	
In re:	: Chapter 11
	: Case No. 05-44481 (RDD)
DELPHI CORPORATION, <u>et al.</u> ,	: Jointly Administered
	:
Debtors.	:
	:
.....X	
DELPHI CORPORATION, <u>et al.</u> ,	: Adv. Pro. No. 07-02270 (RDD)
	:
Plaintiffs,	:
	:
	:
- against -	:
	:
BP, BP AMOCO CORP, BP MICROSYSTEMS	:
INC., BP PRODUCTS NORTH AMERICA,	:
CASTROL, CASTROL INDUSTRIAL	:
AND UNIFRAX CORP.	:
	:
Defendant.	:
.....X	

**UNIFRAX CORPORATION'S SUR-REPLY IN SUPPORT OF ITS  
OBJECTION TO THE REORGANIZED DEBTORS' MOTION FOR  
LEAVE TO FILE AMENDED COMPLAINTS**

Defendant Unifrax Corporation ("Unifrax" or "Defendant"), now known as Unifrax I  
LLC, by and through its counsel, Hodgson Russ, LLP, hereby submits this Sur-Reply in further

support of its objection (the “Objection”) to the Reorganized Debtors’ Motion for Leave to File Amended Complaints (the “Motion”).

### **BACKGROUND**

1. On September 7, 2010 DPH Holdings Corporation and certain of its affiliated reorganized debtors (the “Reorganized Debtors”) filed a Motion for Leave to File Amended Complaints.

2. On November 24, 2010, Unifrax filed an objection to the Motion.

3. On January 28, 2011, the Reorganized Debtors filed an Omnibus Reply in Further Support of the Motion.

### **OBJECTION**

4. In the interest of judicial economy, Unifrax will not repeat and restate the arguments advanced by similarly situated parties who have filed Sur-Replies to the Motion. Unifrax joins and adopts all relevant arguments and authorities, as if fully stated herein, set forth in Johnson Controls, Johnson Controls Battery Group, and Johnson Controls, Inc.’s Sur-Reply (Main Case No. 05-44481, Docket No. 21312), Methode Electronics, Inc.’s Sur-Reply (Main Case No. 05-44481, Docket No. 21319) and Ex-Cell-O Machine Tools, Inc.’s Sur-Reply (Main Case No. 05-44481, Docket No. 21321) as well as in all other objections filed by similarly situated defendants as is they were set forth herein in their entirety. Unifrax reserves its right to supplement this Sur-Reply, including but not limited to providing documentary evidence, and to appear at any and all hearings and conferences scheduled on the Motion.

Dated: June 14, 2011

**HODGSON RUSS LLP**

*Attorneys for Unifrax I, LLC f/k/a  
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By: /s/ James C. Thoman

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